



Kevin Fritz
Partner

Direct (212) 655-3570
kaf@msf-law.com

July 21, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL;*
Jones et al. v. Abel et al., No. 1:25-cv-00779-LJL

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), and pursuant to Your Honor’s Individual Rules, we move for continued sealing of Exhibit A (Dkt. 446-1) to Blake Lively’s motion for alternative service (Dkt. 442).

Exhibit A is a text chain which contains telephone numbers of certain Wayfarer Parties as well as the identity of a client of one of those parties.¹ See *In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at *12 (S.D.N.Y. Jan. 17, 2023) (redaction of names, emails, and phone numbers of non-party individual employees of Keurig was warranted); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at *2 (E.D.N.Y. Mar. 2, 2005) (redaction of “confidential personal contact information such as home telephone numbers and addresses, pager and personal cell phone numbers, Social Security numbers” of Lilly’s non-party employees was warranted). As for the passing reference to the client in Exhibit A, it has no relevance to the claims or defenses herein.

Accordingly, the Wayfarer Parties respectfully request that Exhibit A (Dkt. 446-1) is permanently sealed. Submitted herewith is a redacted version of Exhibit A, with the telephone numbers and client name redacted.

¹ The document, produced by Jonesworks, appears to be a text message procured by Jonesworks in August 2024 when it seized Jennifer Abel’s cellular phone and subsequently provided certain contents therefrom to Vanzan Inc., an entity affiliated with Lively.

Hon. Lewis J. Liman
Page 2
July 21, 2025

Respectfully submitted,

/s/ Kevin Fritz

MEISTER SEELIG & FEIN PLLC
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
Tel: (212) 655-3500
Email: ms@msf-law.com
kaf@msf-law.com

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman (*pro hac vice*)
Ellyn S. Garofalo (*pro hac vice*)
Miles M. Cooley (*pro hac vice*)
Theresa M Troupson (*pro hac vice*)
Summer Benson (*pro hac vice*)
Jason Sunshine
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
Tel: (310) 201-0005
Email: bfreedman@lftcllp.com
egarofalo@lftcllp.com
mcooley@lftcllp.com
ttroupson@lftcllp.com
sbenson@lftcllp.com
jsunshine@lftcllp.com

Mitra Ahouraian (*pro hac vice*)
2029 Century Park East
4th Floor
Los Angeles, CA 90067
(310) 376-7878
Email: mitra@ahouraianlaw.com

cc: all counsel of record (via ECF)